



Chattel Architecture Planning & Preservation, Inc.

## Memorandum

DATE February 18, 2011

TO Louis Skelton, Chairman and Commissioners

Los Angeles County Historical Landmarks and Records Commission

FROM Robert Chattel, AIA President

Kathryn McGee, Associate

Chattel Architecture, Planning & Preservation, Inc.

RE Golden Gate Theater, 909 S. Atlantic Boulevard, Los Angeles CA

Secretary's Standards Conformance Review (Revised Version)

## Introduction

This memorandum reviews a project to reuse Golden Gate Theater in East Los Angeles as a CVS Pharmacy. The Final EIR for this project has been approved by Los Angeles County Regional Planning Commission and Board of Supervisors and has been certified. That document contains mitigation measures requiring review and approval of construction documents by the County Historical Landmarks and Records Commission. Another mitigation measure requires a qualified professional architectural historian review construction documents for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards); the following review, prepared by Chattel Architecture, Planning & Preservation, Inc. (Chattel), constitutes this evaluation. Chattel will be present at the upcoming Historical Landmarks and Records Commission meeting to give a brief presentation and answer questions. This review finds the construction documents to be consistent with prior approvals and in conformance with the Secretary's Standards. As the construction documents are still in progress and not ready to receive a final permit, we conclude with a list of items we recommend the Historical Landmarks and Records Commission direct the applicant, Charles Company, to address in construction documents prior to issuance of building permits.

## **Background**

Located at 909 S. Atlantic Boulevard in East Los Angeles, Golden Gate Theater is listed in the National Register of Historic Places (National Register) and is a historical resource under the California Environmental Quality Act (CEQA). Following issuance of the project Draft EIR (March 2009), the Los Angeles County Regional Planning Commission requested the applicant retain a historic preservation consultant to provide independent project review and analysis. Charles Company sought assistance from Chattel to collaborate on development of a *modified project design* that would reduce significant historical resource impacts (Appendix C). Representing the County and paid by the applicant, Chattel has since worked closely with County planning staff, applicant, potential tenant and Los Angeles Conservancy to guide preparation of a *modified project design* that substantially reduced historical resources impacts (see Conservancy support letter, Appendix F). The *modified project design* was included in the Final EIR (January 2010) with an evaluation by

Chattel finding that it did not result in significant historical resources impacts under CEQA, although it was not found to be in conformance with the *Secretary's Standards*. The Final EIR was appealed to Los Angeles County Board of Supervisors, who ultimately approved its certification with Mitigation Measures and Conditions of Approval relating to treatment of historic resources (Appendices D and E).

## Secretary's Standards

CEQA Guidelines §15064.5(b)(3) indicate that effects on historical resources resulting from a project found in conformance with the *Secretary's Standards* are generally considered mitigated to a less than significant level. The *Secretary's Standards* contain four treatments; the applicable treatment for Golden Gate Theater is rehabilitation. Rehabilitation is recommended as a treatment "when repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, rehabilitation may be considered as a treatment." "Rehabilitation...emphasizes the retention and repair of historic materials, but more latitude is provided for replacement because it is assumed the property is more deteriorated prior to work." The rehabilitation standards are listed below and referred to throughout this report:

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
- 3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work

<sup>&</sup>lt;sup>1</sup> Kay D. Weeks, "Historic Preservation Treatments: Toward a Common Language" (Washington, D.C.: National Park Service, undated) <a href="http://www.nps.gov/hps/tps/common\_language\_article.htm">http://www.nps.gov/hps/tps/common\_language\_article.htm</a>.

will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The Secretary's Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change while retaining historic building fabric to the maximum extent feasible. Their interpretation requires exercise of professional judgment and balance of the various opportunities and constraints of any given project based on use, materials retention and treatment, and compatibility of new construction.

The *Secretary's Standards* evaluate cumulative impacts to historical resources; a project is either in conformance or not in conformance. The appropriate evaluation is whether the project as a whole conforms, rather than whether individual project components comply with specific standards. Not every standard necessarily applies to every aspect of a project, nor is it necessary to comply with every standard to achieve conformance. Conformance with the *Secretary's Standards* is a high level of review. While conformance results in a less than significant impact to historical resources under CEQA, nonconformance does not necessarily equal material impairment of historical resources (a significant impact) under CEQA.<sup>2</sup> A project has a significant impact if it would result in a substantial adverse change to significance of a historical resource,<sup>3</sup> or, generally when a property would be rendered ineligible for listing.<sup>4</sup>

The *modified project design* had not gone through design development when previously evaluated for conformance with the *Secretary's Standards*. It was conceptual and flexible, including a range of options for further study during design development. Nevertheless, it contained sufficient detail to determine that the project would result in a less than significant impact under CEQA. However, it was determined that while there would not be material impairment to historical resources, the project was not in conformance with the *Secretary's Standards*. As such, the project team took a conservative approach, conceding that the *modified project design* would result in significant historical resources impacts and pursued adoption of a Statement of Overriding Considerations.

Since adoption of the Final EIR, the *modified project design* has been refined; construction documents illustrate a project in conformance with the *Secretary's Standards*. This finding is supported below in a detailed evaluation of construction documents dated January 27, 2011 and containing the following sheets, as listed on the cover sheet: CS; HNM-1 – HNM-4; C-1 – C-19; HPD-1.1 – HPD-5.1; AS-1.1 – AS-1.2; A-0.1 – A-8.1; F-1; S-1 – S-11; M-0.1-M-1.4; P-1.1 – P-1.3; FP-0 – FP-4; SE-1.1 – SE-1.2; E-0.1 – 3.2. Landscaping plans and east, south and west elevation signage are not part of this review. Included as appendices are historic and existing photographs, County Board of Supervisors-approved cultural resources mitigation measures and Conditions of Approval, and a project support letter from the Los Angeles Conservancy.

<sup>&</sup>lt;sup>2</sup> Material impairment occurs when a project alters or demolishes in an adverse manner "those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in ... the California Register of Historical Resources" ((CEQA Guidelines §15064.5(b)(2)(A)).

<sup>&</sup>lt;sup>3</sup> "Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (§15064.5(b)(1) of CEQA Guidelines).

<sup>&</sup>lt;sup>4</sup>§21084.1 of California Public Resources Code and §15064.5 of CEQA Guidelines.

## **Evaluation of the Construction Documents**

Construction documents contain a design that is essentially reversible, in conformance with rehabilitation standard 10, meaning the building could be converted back to theater use in the future. This does not imply all original historic fabric will be retained, but that elements essential to theater function, such as the balcony, sequence of spaces, high-volume auditorium, and certain decorative features, will remain. Historic features that cannot be incorporated into the reused tenant space will be salvaged, crated, recorded and stored on site in such a manner that makes possible their future reinsertion. Designs for specific spaces and features are described in detail below.

#### **Exterior**

## North Facade

- Decorative features, including ornament and openings shall be retained, stabilized and restored, in conformance with Standard 5, and shall be cleaned and maintained with gentlest means possible at less than 400 psi, to be determined after inspection and recommendation by a qualified masonry restoration specialist, in conformance with Standards 6 and 7.
- North facade shall remain primary point of building entry and main entrance openings shall
  be retained to maintain the building's distinctive character, in conformance with Standard 2.
  Existing wood frame doors (three sets) shall be recorded, salvaged, crated, and stored onsite to allow for replacement with three sets of contemporary automatic aluminum doors.
  New doors will consist of two sets of sliding or swinging doors (center and east doors) and
  one set of doors that will be fixed in place (west doors). Regardless of door type, all three
  sets of doors will match as closely as possible. If feasible, doors will have thick rails and
  styles to resemble original (see Fixture Plan, sheet F-1 for more detail).
- Canopy remnant over main entrance shall be restored. While a contemporary canopy was
  proposed in the *modified project design*, recent research has yielded images of the canopy's
  original appearance, making possible its accurate restoration (Appendix A, figs 10 and 13).
- Wrought iron railing for balcony above main entry shall be reconstructed based on historic photos and research. Existing wood doors and three-light lunette at balcony to be restored.
- Selection of off-white paint color for exterior wall surfaces was made based on tenant needs and recommendations by Chattel for consistency with historic photos indicating exterior surfaces were historically painted off-white (Appendix A, fig 1).
- Tenant signage shall be placed in center bay of north façade, no taller than 12-ft in height and no longer than 10-ft in length; it shall also be placed on the main entrance canopy, no taller than 5-ft in height and no longer than 25-ft in length.

## East Elevation

- Historic utilitarian character and identity as a secondary elevation shall be maintained, in conformance with Standards 2 and 3.
- Existing doors, vents, and other openings shall be closed, as necessary and appropriate, but shall still read as openings, denoted by recessed solid or pierced infill expressed with shadow lines, in conformance with Standard 5. Any historic material removed to accommodate infill, such as existing metal grates, will be carefully recorded, salvaged, crated and stored on site in the balcony mezzanine.
- Retention of the existing fire escape stair was studied, however, it was determined that due
  to tenant preference this feature shall be removed.
- Selection of off-white paint color for exterior wall surfaces was made based on tenant needs and recommendations by Chattel for consistency with historic photos indicating exterior surfaces were historically painted off-white (Appendix A, fig 1).
- A retaining wall will be added east of the elevation's south end (sheet C-6). The gap

- between retaining wall and building exterior wall will be lined with bentonite material and filled with a compacted fill of concrete masonry block (CMB) or approved soil; it will be appropriately capped to prevent water infiltration and damage to building exterior (see detail 2, sheet C-15).
- While east elevation signage is not included in construction documents or reviewed in this report, the previously approved signage in the *modified project design* is proposed in two locations on the east elevation: (1) in the elevation's center bay, consisting of individual channel letters on a raceway, no taller than 5-ft in height and no longer than 25-ft in length; and (2) on the east edge of the south elevation drive-through canopy, no taller than 9-inches in height and no longer than 10-ft in length.

### South Elevation

- Historic utilitarian character and identity as a secondary elevation shall be maintained, in conformance with Standards 2 and 3.
- Existing doors, vents, and other openings shall be closed, as necessary and appropriate, but shall still read as openings, denoted by recessed solid or pierced infill expressed with shadow lines, in conformance with Standard 5. Any historic material removed to accommodate infill, such as existing metal grates, will be carefully recorded, salvaged, crated and stored on site in the balcony mezzanine.
- A new opening is proposed for a pharmacy drive-up window, adjacent to a location of previous infill which may have served as a truck door. Opening new doors and windows on a secondary elevation is generally in conformance with the *Secretary's Standards* if they follow a pattern similar to the original; the south elevation shall remain a secondary elevation with minimal change, in conformance with Standards 2 and 5.
- A drive-up window canopy extending 17-ft south of the elevation and 20-ft in length along the elevation and supported on two columns is proposed.
- Selection of off-white paint color for exterior wall surfaces was made based on tenant needs and recommendations by Chattel for consistency with historic photos indicating exterior surfaces were historically painted off-white (Appendix A, fig 1).
- While south elevation signage is not included in construction documents or reviewed in this report, the previously approved signage in the *modified project design* is proposed in three locations on the south elevation: (1) an area 25-ft by 50-ft centered on the elevation, to possibly contain tenant advertising or a painted mural, although the painted mural is no longer being considered as part of this project (while banner signage in this area is was also previously considered, it is no longer being considered as part of this project and is not included in construction documents); (2) in the elevation's east bay above the drive-up window, consisting of individual channel letters on a raceway, in a 5-ft by 25-ft area with sign letters not exceeding 48-in in height and 25-ft in length; (3) and on the drive-up window canopy edge with an area for letters not to exceed 1-ft in height and 10-ft in length.

#### West Elevation

- Historic utilitarian character and identity as a secondary elevation shall be maintained, in conformance with Standards 2 and 3.
- Existing doors, vents, and other openings shall be closed, as necessary and appropriate, but shall still read as openings, denoted by recessed solid or pierced infill expressed with shadow lines, in conformance with Standard 5. Any historic material removed to accommodate infill, such as existing metal grates, will be carefully recorded, salvaged, crated and stored on site in the balcony mezzanine.
- While retention of the existing fire escape stair was studied, it was determined that this
  feature shall be removed for replacement with a new access ladder and platform providing a
  secure, single point of access to the interior at balcony level (sheet A-4.1).

- A fire riser will be added at north end of west elevation, positioned behind façade edge.
- Selection of off-white paint color for exterior wall surfaces was made based on tenant needs and recommendations by Chattel for consistency with historic photos indicating exterior surfaces were historically painted off-white (Appendix A, fig 1).
- While west elevation signage is not included in construction documents or reviewed in this report, the previously approved signage in the *modified project design* is proposed in the elevation's south bay, consisting of individual channel letters on a raceway and not exceeding 5-ft in height and 30-ft in length and in a 2-ft by 16-ft, 8-in area in the elevation's north bay.

## Signage

- As noted above, tenant signage will be placed on the north façade above the canopy and on the leading edge of the new contemporary canopy; there will be additional signage on east, south and west elevations.
- The existing pole sign at the southeast corner of the site will be reused and a monument sign will be added on the site at the corner of Atlantic and Whittier Boulevards. Originally occupied by theater and commercial uses, the property historically had substantial signage along the property edge on the now demolished Vega Building. Addition of new signage reflects historic site character and is therefore appropriate and in conformance with Standard 2; it is also reversible, in conformance with Standard 10.
- As signage plans for east, south and west elevations are currently under negotiation with the tenant and may ultimately differ from that presented in the Final EIR, it is our recommendation that final review and approval of signage plans for east, south and west elevations be made by Los Angeles County Regional Planning Commission.

#### Interior

## Lobby

- Distinctive lobby features shall be preserved to the maximum extent feasible, in conformance with Standard 5.
- The former lobby shall retain its original use as the primary entrance space and will incorporate cashier stations and shopping cart storage. Main entrance openings shall be retained to maintain the building's distinctive character, in conformance with Standard 2. Existing wood frame doors (three sets) shall be recorded, salvaged, crated, and stored on-site to allow for replacement with three sets of contemporary automatic aluminum doors. New doors will consist of two sets of sliding or swinging doors (center and east doors) and one set of doors that will be fixed in place (west doors). Regardless of door type, all three sets of doors will match as closely as possible. If feasible, doors will have thick rails and styles to resemble original (see Fixture Plan, sheet F-1 for more detail).
- Overall scale and height of lobby shall be preserved, maintaining an approximately 11-ft, 4-in high space between finished floor and coffered ceiling beams. Ceilings shall be clad in a suspended grid that incorporates light fixtures without acoustical ceiling tiles so coffered plaster ceiling remains visible. As lobby ceilings and walls are highly decorative and would require substantial effort to fully repair and repaint, complete conservation or restoration will not be part of this project. To repair damage and allow for preservation (stabilization), damage to lobby ceilings and walls shall be patched and infill painted as necessary.
- Fire protection sprinklers shall be located so that they do not interrupt historic features and minimize penetrations in historic ceiling.
- Lobby restrooms located in northeast and northwest corners have not been identified as significant features and will be removed to enlarge lobby for retail use. Ceiling modifications will take the form of a bulkhead extending below the existing ceiling in order to terminate the decorative coffered ceilings in the area of the removed restrooms.

- As per Mitigation Measure 3.2.7 (Appendix C), prior to issuance of building permits, the existing concession shell and attached curved staircase shall be recorded, salvaged, crated and stored on-site to increase floor area for cashier stations and allow open line of sight through building. This will involve crating and lifting the shell and, as necessary, a small portion of the attached stair wall, to the mezzanine lobby for storage. The majority of the stair will be removed, although the project architect will prepare detailed, hand-measured drawings and selective templates of stair for possible future reconstruction; stair handrails shall be salvaged and stored in a similar manner to the shell.
- Sense of lobby enclosure and sequence of space from lobby to auditorium shall be retained, in conformance with Standards 1 and 2. While wall dividing lobby from auditorium shall be removed between gridlines 1 and 3, and between gridlines 4 and 6 to allow open line of sight and access through building, existing decorative pilasters, wing walls, and headers shall be retained *in situ* or in place to preserve sense of lobby enclosure and transition into auditorium (gridline F.2, sheets HPD-1.1 and A-1.1). The central balcony stair's mid-point landings east and west of the center bay shall also be removed.
- Tile fountains (gridline G.3) shall be recorded, salvaged, crated and stored on-site.
- As necessary and appropriate, existing lead based paint shall be encapsulated behind new paint layer.

#### **Auditorium**

- In response to studies required by Mitigation Measure 3.2.5 and in conformance with Standard 1, the construction documents include retention of auditorium balcony, exposure of historic interior building fabric, and retention of sequence of space from lobby into auditorium and through to stage, in conformance with Standard 1.
- The ramped floor extending south toward the stage will be filled with foam or like material and covered with a new floor slab to create a level floor through building. The new floor slab will be approximately 2-ft above existing stage floor level and will provide an approximately 9-ft head height under balcony.
- As this project requires use of the California Historical Building Code (CHBC), the CHBC was applied to building seismic evaluation. The CHBC allows 75% of seismic strength required under prevailing code. Structural evaluations determined it necessary to provide additional support to the balcony to reach this threshold. This support will be provided in the form of, two moment frames, located along gridlines F.1 and E.1, added under the balcony (details 1 and 2, sheet A-5.1). Each moment frame will have two vertical members located immediately south of existing columns to minimize intrusion into the space; vertical members will not directly abut columns and will avoid ceiling coffers. As both moment frames will tie into existing beams in balcony underside, there will be no visible horizontal support. Penetrations in balcony underside will be carefully made to minimize damage to ceiling and will be patched as necessary. A range of options for seismic upgrade were studied and addition of two moment frames as described above is the least invasive and least damaging to historic fabric. Addition of the moment frame is in conformance with Standard 1, which allows for a new use, and Standard 5, as it will retain distinctive features and finishes.
- A range of options for treatment of the high volume auditorium space between the balcony edge and stage was studied and evaluated based on the needs of the tenant, with the goal of exposing the volume of the space and the decorative ceiling and walls to the maximum extent feasible. Feasibility of cleaning of the attic space between the auditorium's historic ceiling and roof was also studied so treatment of this issue could factor into ability to expose the historic ceiling. These evaluations ultimately resulted in a plan that exposes the The high volume space in this area (including ceiling and walls above 9-feet and generally between gridlines B and E and including ceiling), which will be fully visible from the sales floor. A new wall will be built north of the balcony edge, curving to follow the existing seating and

- encapsulating most of the area above the balcony (between gridlines D and E, sheet A-5.1). This area and the mezzanine lobby will not be publicly accessible and will be used for storage of historic features and mechanical equipment as necessary. Primary access will be provided by a new exterior access ladder and platform at the west elevation.
- A study on feasibility of heating and cooling the high volume auditorium space resulted in decision to build a new wall in balcony, eliminating need to heat and cool space above balcony and in balcony mezzanine. HVAC and other mechanical equipment will be located in the area north of the new balcony wall described above, as well as in the new mezzanine inserted in the stage fly tower (described below), and in the former restrooms in northeast and northwest corners of the mezzanine lobby. The decision to use these spaces for equipment suits the tenant's needs because it does not intrude into the sales floor; it is also preferable because it minimally disturbs historic fabric.
- Upper portions of auditorium walls (above 9-ft above new floor level), including curved walls
  flanking proscenium arch, shall be exposed. New 9-ft walls will be constructed in front of
  existing to accommodate retail display units and shelving along interior perimeter. Historic
  fabric will not be removed to accommodate these walls.
- The decorative walls, ceiling, curved areas flanking the stage, and the leading edge of the balcony will remain visible, in conformance with Standards 2 and 5.
- While much of the auditorium walls and ceiling will be preserved (stabilized), repainted and visible from the sales floor, they are highly decorative and would require substantial effort to fully repair and repaint, as such, complete conservation or restoration of these features will not be part of this project. To repair damage and allow for preservation (stabilization) of historic building fabric, damage to walls and ceiling shall be patched and infill painted and/or repainted as necessary. Gold-colored decorative elements will be patched and infill painted as necessary. Wall and ceiling surfaces visible from the sales floor will be painted off-white.
- As necessary and appropriate, existing lead based paint shall be encapsulated behind new paint layer.
- A range of options for treatment of the coffered balcony underside was studied and evaluated based on tenant needs and with the goal of exposing this area to the maximum extent feasible. It was ultimately decided that the coffered balcony underside would be preserved (stabilized), repainted and exposed (to be visible from the sales floor). While a suspended grid system was studied for purposes of incorporating lighting, it has been determined that lighting can be provided on freestanding retail display units, or, gondolas (sheet A-3.1, detail 3), eliminating the need to obscure views of the historic ceiling. While the coffered balcony underside will be stabilized, repainted and exposed, it is highly decorative and would require substantial effort to fully repair; as such, complete conservation or restoration will not be part of the project. Work done to stabilize, repaint and expose this feature is in conformance with the Secretary's Standards and will involve repair to damage, patching and painting as necessary.
- Fire protection sprinklers shall be located such that they do not interrupt historic features and minimize penetrations in historic ceiling.
- Auditorium lighting will be provided from freestanding retail display units, or, gondolas (sheet A-3.1, detail 3).
- As per the project Conditions of Approval (Appendix D), historic ceiling-mounted fixtures at balcony underside will be restored and remounted to be visible from sales floor; they will be made functional if possible (sheet HPD-3.1, note 17 and sheet A-3.1). Two historic chandeliers originally located above balcony will be restored and remounted to be visible from the sales floor in locations of existing junction boxes located near gridline B.7 (sheet HPD-3.1.1 and sheet A-3.1.1). Extant remnants of historic fixtures and chandeliers not reused, along with remnants of any extant historic wall sconces shall be carefully recorded, salvaged, crated and stored on site in the balcony mezzanine.

 A significant amount of pigeon guano currently sits in the attic space between historic ceiling and roof. While majority of the guano can be vacuumed, further cleaning of area above the ceiling shall be carefully studied, as applying moisture to either side of a painted plaster ceiling can damage ceiling structure and decoration.

## Mezzanine Lobby

- Mezzanine lobby shall be encapsulated and made accessible only by an exterior fire escape ladder and platform at the west elevation. It will be used for storage and will contain an equipment platform for HVAC, mechanical and electrical equipment.
- As necessary and appropriate, walls will be finished as necessary for lead paint abatement, likely involving encapsulation of lead paint layer with new paint.
- Fire protection sprinklers shall be located such that they do not interrupt historic features and minimize penetrations in historic ceiling.

## Stage

- In response to studies required by Mitigation Measure 3.2.5 and in conformance with Standard 1, the construction documents include that visibility of proscenium arch and surrounding ornament flanking stage shall be maintained.
- A new mezzanine level shall be inserted into the high volume stage space (between gridlines A and B) to contain HVAC, mechanical and electrical equipment and storage. The wall built to enclose the new mezzanine shall extend behind and reaching from the crest of the proscenium arch down approximately halfway to the new floor. The possibility of painting on the new wall a tromp l'oeil partially drawn-up stage curtain (drawing on design of an appropriate historic stage curtain) shall be explored.
- A pharmacy capped with an approximately 12-ft high ceiling will be inserted in the stage
  area, the east side of which will extend north into the auditorium. The west stage area will
  contain a receiving space (see sheet F-1 for fixture plan).
- As the proscenium arch and surrounding walls and ceiling are highly decorative and would require substantial effort to fully repair and repaint, complete conservation or restoration is not part of this project. To repair damage and allow for preservation (stabilization), damage to these features shall be patched and infill painted as necessary. Distinctive decoration and ornament on or adjacent to the proscenium arch shall be preserved, in conformance with Standard 5.
- Gold-colored decorative elements will be patched and infill painted as necessary. Wall and ceiling surfaces visible from the sales floor will be painted off-white.
- As necessary and appropriate, existing lead based paint shall be encapsulated behind new paint layer.
- Fire protection sprinklers shall be located such that they do not interrupt historic features and minimize penetrations in historic ceiling.

## Conclusion

Construction documents conform with the *Secretary's Standards*. The proposed project demonstrates a serious and concerted effort to reduce significant historical resources impacts identified in the Draft EIR. While the *modified project design* contained in the Final EIR was not found in conformance with the *Secretary's Standards*, design advances since certification of the Final EIR have resulted in a project in conformance with the *Secretary's Standards*. Likewise, it is Chattel's professional opinion that the construction documents will not result in material impairment and, accordingly, will not result in a significant impact under CEQA.

## Recommended Action Items for Historical Landmarks and Records Commission

As previously mentioned, certain elements of the construction documents are still in the process of being designed. We recommend the County Historical Landmarks and Records Commission approve the construction drawings with the caveat that the comments listed below be addressed in the construction drawings to satisfaction of Chattel prior to issuance of a building permit. While individually these items may not harm historical resources, they are of collective importance.

<u>Sheet</u>	<u>Comment</u>
HMM-1 – HMM-4	Rename sheets "Conditions of Approval and Mitigation Monitoring and Reporting Program" to refer to all drawings (not just historic preservation).
HMM-1 – HMM-2 C-15	Fix graphic error (multiple lines of dots cross page).  Revise details on this page to indicate bentonite (clay-like) material (and not roofing paper) will be used as barrier between retaining wall and building exterior.
HPD-1.1 – HPD-3.1.1	Revise crosshatching and lines (general notes 10 and 11), which can be misleading, possibly indicating all historic finishes in shaded area will be encapsulated. Care has been taken to ensure certain historic features, such as wing walls and headers (gridline F.2) and auditorium walls above 9-ft will remain visible.
HPD-1.2	Include note that area behind (north of) new balcony wall will be painted as necessary for lead paint encapsulation.
HPD-4.2	Include existing metal stair (to be demolished) at east elevation.
A-4.1	Revise detail 1 key note 23 to refer to key note 13 (access ladder and platform).
A-4.2	Cross-reference detail 3 showing west elevation ladder, landing, railing and security door with sheet A-4.1, detail 1.
A-5.1	As per Mitigation Measure 3.2.5, study a range of options for treatment of the new wall for the mezzanine that will be inserted in the stage fly tower; determine if a tromp l'oeil stage curtain shall be painted on this surface. Include in detail 3 an appropriate key note
A-7.2	Revise detail 1 (door schedule) to include the fixed door that will be located in the west door set at the main entrance.
Multiple	Confirm operation of main entrance doors and consistently include in drawings as either sliding or swinging.
Multiple	Cross-reference finish schedules on all relevant drawings.

## **Appendices**

- A: Historic Photos (figs 1-18)
- **B:** Existing Photos (figs 19-56)
- **C:** Cultural Resources Mitigation Measures for Final EIR for reuse of Golden Gate Theater (approved by Los Angeles County Board of Supervisors)
- **D:** Cultural Resources Conditions of Approval for Final EIR for reuse of Golden Gate Theater (approved by Los Angeles County Board of Supervisors)
- E: Los Angeles Conservancy support letter for modified project design (March 17, 2010)

# **APPENDIX A**

Historic Photos



Figure 1: Golden Gate Theater and Vega Building (demolished), aerial view northwest, 1935 (Spence Air Photo Archives, University of California, Los Angeles)



Figure 2: View southwest, Golden Gate Theater wrapped by Vega Building (demolished), c. 1927-1928 (Dick Whittington Collection, University of Southern California Digital Library)

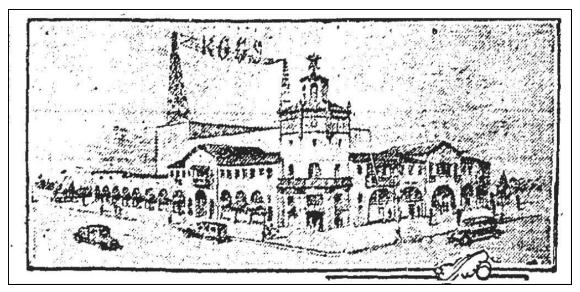


Figure 3: Golden Gate Theater and Vega Building (demolished), sketch, ("Whittier Boulevard Unit Rising," Los Angeles Times, 13 Feb 1927, E2, ProQuest Historical Newspapers, Los Angeles Public Library)

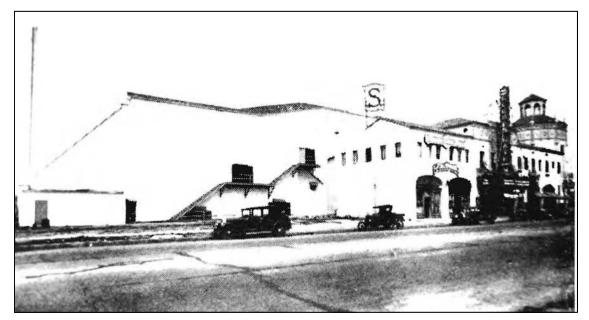


Figure 4: Golden Gate Theater (left) and Vega Building (demolished), early photograph, date unknown (photograph of negative, Academy of Motion Picture Arts and Sciences Library, B'hend and Kaufmann Collection)

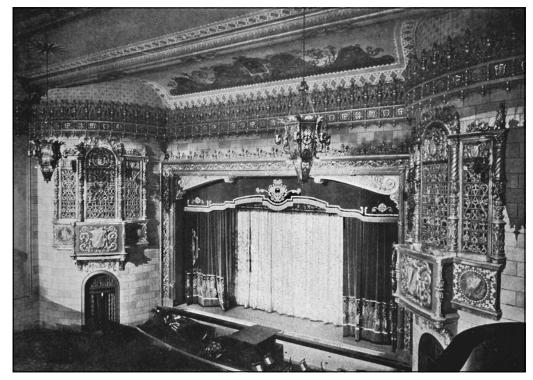


Figure 5: Golden Gate Theater, interior, view southeast looking toward stage, 1928 (Architectural Digest, vol 7, no 3, p 144).



Figure 6: Golden Gate Theater, interior, view northeast into balcony lobby, 1928 (Architectural Digest, vol 7, no 3, p 144).

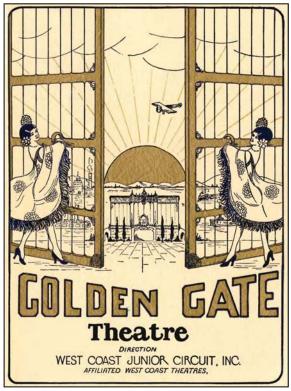


Figure 7: Golden Gate Theater, cover of opening night souvenir program, September 21, 1928, (Academy of Motion Picture Arts and Sciences Library, B'hend and Kaufmann Collection)



Figure 8: Vega Building (demolished) , view southwest of north elevation fronting Whittier Boulevard, 1955 (Academy of Motion Picture Arts and Sciences Library, B'hend and Kaufmann Collection)



Figure 9: Golden Gate Theater and Vega Building (demolished), view southwest showing entrance to theater through Vega Building, 1955 (Academy of Motion Picture Arts and Sciences Library, B'hend and Kaufmann Collection)



Figure 10: Golden Gate Theater and Vega Building (demolished), detail view southwest showing entrance to theater through Vega Building, 1955 (Academy of Motion Picture Arts and Sciences Library, B'hend and Kaufmann Collection)



Figure 11: Golden Gate Theater and Vega Building (demolished), view southwest, date unknown (Los Angeles Public Library Photo Collection, Photo No. 0015321)



Figure 12: Golden Gate Theater and Vega Building (demolished), view southwest, 1980 (William Reagh, Los Angeles Public Library Photo Collection, Photo No. 0015322)



Figure 13: Golden Gate Theater, detail view south of main entrance, c. 1980s (Tom Zimmerman)



Figure 14: Golden Gate Theater, view through Vega Building entrance (demolished), c. 1980s (Tom Zimmerman)

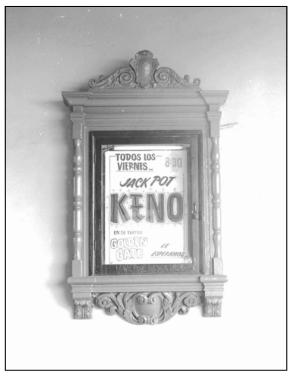


Figure 15: Golden Gate Theater, detail view of signage in Vega Building arcade, c. 1980s (Tom Zimmerman)



Figure 16: Golden Gate Theater, detail view of light fixture, c. 1980s (Tom Zimmerman)

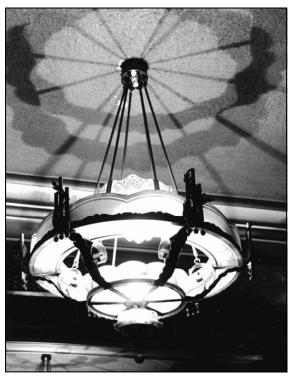


Figure 17: Golden Gate Theater, detail view of light fixture, c. 1980s (Tom Zimmerman)



Figure 18: Golden Gate Theater, detail view of light fixture, c. 1980s (Tom Zimmerman)

# **APPENDIX B**

**Existing Photos** 



Figure 19: Golden Gate Theater, exterior, view southwest from Whittier Boulevard showing north façade (right) and east elevation (left) (Chattel Architecture 2009)



Figure 20: Golden Gate Theater, exterior, view southeast of north façade (Chattel Architecture 2009)



Figure 21: Golden Gate Theater, exterior, detail view southwest of main entrance (Chattel Architecture 2010)



Figure 22: Golden Gate Theater, exterior, detail view southwest of balcony window above main entrance (Chattel Architecture 2010)



Figure 23: Golden Gate Theater, exterior, east elevation (Chattel Architecture 2010)



Figure 24: Golden Gate Theater, exterior, west elevation (Chattel Architecture 2010)



Figure 25: Golden Gate Theater, exterior, view north of south elevation (center) and western edge of Jim's Burgers food stand (right) (Chattel Architecture 2009)



Figure 26: Jim's Burgers food stand, south elevation (Chattel Architecture 2009)



Figure 27: Golden Gate Theater, interior, view northeast of lobby, showing main entrance doors (Chattel Architecture 2010)



Figure 28: Golden Gate Theater, interior, view west of lobby showing concession shell and stair to mezzanine (left) and main entrance doors (right) (Chattel Architecture 2010)



Figure 29: Golden Gate Theater, interior, view southwest of lobby concession shell and attached stair to mezzanine (Chattel Architecture 2009)



Figure 30: Golden Gate Theater, interior, view southeast of lobby concession shell and attached stair to mezzanine (Chattel Architecture 2009)



Figure 31: Golden Gate Theater, interior, view west of stair to mezzanine and attachment to lobby concession shell (Chattel Architecture 2009)



Figure 32: Golden Gate Theater, interior, view east from stair to mezzanine, showing ground floor lobby (bottom left) and mezzanine lobby (top left) (Chattel Architecture 2009)



Figure 33: Golden Gate Theater, interior, view east into east wing of lobby showing fountain (left) and doors to auditorium (right) (Chattel Architecture 2009)



Figure 34: Golden Gate Theater, interior, view south into west wing of lobby showing fountain (left) and restrooms (right) (Chattel Architecture 2009)



Figure 35: Golden Gate Theater, interior, view southeast from lobby toward doors to auditorium (Chattel Architecture 2009)



Figure 36: Golden Gate Theater, interior, view northeast from auditorium (under balcony) looking toward lobby (Chattel Architecture 2010)



Figure 37: Golden Gate Theater, interior, view northwest showing underside of balcony and entrances to lobby (Chattel Architecture 2009)



Figure 38: Golden Gate Theater, interior, view north showing underside of balcony looking toward lobby (Chattel Architecture 2009)



Figure 39: Golden Gate Theater, interior, view northeast showing underside of balcony looking toward lobby (Chattel Architecture 2009)



Figure 40: Golden Gate Theater, interior, detail view of ceiling-mounted lighting fixture under balcony (Chattel Architecture 2009)



Figure 41: Golden Gate Theater, interior, view east of underside of balcony (Chattel Architecture 2009)



Figure 42: Golden Gate Theater, interior, view northeast showing damage to underside of balcony and leading balcony edge (Chattel Architecture 2009)



Figure 43: Golden Gate Theater, interior, view southwest into auditorium (Chattel Architecture 2009)



Figure 44 Golden Gate Theater, interior, view northwest showing balcony seating and balcony edge (Chattel Architecture 2009)

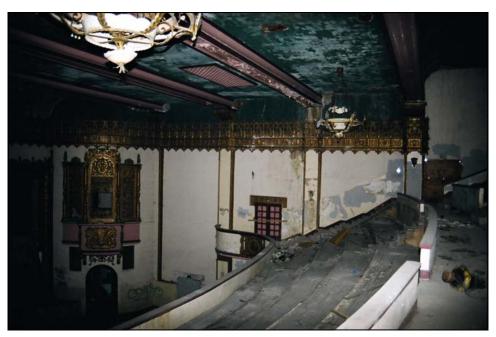


Figure 45: Golden Gate Theater, interior, view southwest from balcony showing balcony seating (right) and edge of proscenium arch (left) (Chattel Architecture 2009)



Figure 46: Golden Gate Theater, interior, detail view of ceiling light fixture above balcony (typical) (Chattel Architecture 2009)



Figure 47: Golden Gate Theater, interior, view northwest from balcony seating looking toward projection booth (Chattel Architecture 2009)



Figure 48: Golden Gate Theater, interior, view northeast from balcony (Chattel Architecture 2009)



Figure 49: Golden Gate Theater, interior, view southwest looking toward stage (Chattel Architecture 2009)



Figure 50: Golden Gate Theater, interior, view southeast looking toward stage (Chattel Architecture 2009)



Figure 51: Golden Gate Theater, interior, detail view southwest showing proscenium arch and ceiling detail (Chattel Architecture 2009)



Figure 52: Golden Gate Theater, interior, detail view northwest showing ceiling and ornament damage (typical) above balcony (Chattel Architecture 2009)



Figure 53: Golden Gate Theater, interior, detail view southeast showing ceiling and ornament damage (typical) above balcony (Chattel Architecture 2009)

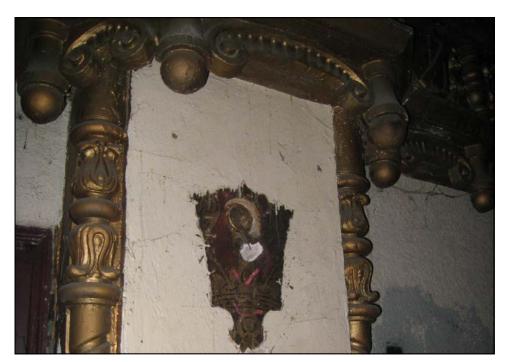


Figure 54: Golden Gate Theater, interior, detail view southwest showing wall ornament and ceiling damage (typical) above balcony; note that area of sconce removal contains polychromatic painting, indicating surfaces have been overpainted (Chattel Architecture 2009)



Figure 55: Golden Gate Theater, interior, view southwest of mezzanine lobby (Chattel Architecture 2009)



Figure 56: Golden Gate Theater, interior, view northeast of mezzanine lobby (top) and ground floor lobby (bottom) (Chattel Architecture 2009)

## **APPENDIX C**

Cultural Resources Mitigation Measures for Final Environmental Impact Report for Reuse of Golden Gate Theater (approved by County of Los Angeles Board of Supervisors)

Mitigation Measure	Responsible Agency or Party	Action Required	Monitoring Agency or Party	Timing
Cultural Resources				
Mitigation Measure 3.2.1: Maintenance, repair, stabilization, restoration, preservation, and conservation of all of the exterior and certain elements of the interior of the Golden Gate Theater Building shall be conducted in a manner consistent with the Rehabilitation Standards of the Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Secretary's Standards, 1995), Weeks and Grimmer, as set forth in the Final EIR. Prior to the issuance of a building permit and to the satisfaction of the Los Angeles County Department of Regional Planning (DRP), the project developer shall retain a qualified professional architectural historian to prepare a Secretary's Standards conformance report, and oversee and advise on the rehabilitation of the Golden Gate Theater Building. Supervision will include activities relating to materials selection, construction methods, and aesthetic and physical exterior and interior alterations that are to be utilized, and the manner in which they are to be employed in rehabilitation of the historical resource. At a minimum the	Project Applicant	Hire a professional architectural historian to oversee and advise on the rehabilitation plan, and review the design development plans against the State Historical Building Code for compliance to the maximum extent possible.	Los Angeles County Department of Regional Planning	Prior to issuance of building permit

Mitigation Measure	Responsible Agency or Party	Action Required	Monitoring Agency or Party	Timing
project shall retain key elements essential to theater function, as set forth in the Final EIR. The design development plans shall be reviewed with the California Historical Building Code (CHBC, Part 8 of Title 24) provisions for compliance to the best reasonable extent.				
Mitigation Measure 3.2.2: The Los Angeles County Historical Landmarks and Records Commission shall review and approve the design development plans for consistency of the maintenance, repair, stabilization, restoration, preservation and conservation of the exterior and certain elements of the interior of the Golden Gate Theater Building as noted in Mitigation Measure 3.2.1 with the Secretary of the Interior's Standards for Rehabilitation.	Project Applicant	Obtain approval of the design development plans from the Los Angeles County Historical Landmarks Commission	Los Angeles County Department of Regional Planning and Los Angeles County Historical Landmarks Commission	Prior to issuance of building permits
Mitigation Measure 3.2.3: A "Historic American Building Survey" (HABS) documentation shall be prepared to the satisfaction of the DRP. Such a procedure involves the recording of the structure through a written report and large-format photographs. The documentation would be completed on standardized forms and would be accurate in detail to such an extent that after alteration, the structure could be restored/reconstructed	Project Applicant	Submit a Historic American Building Survey for approval by Los Angeles County Department of Regional Planning; the survey shall be filed once approved	Los Angeles County Department of Regional Planning , State of California Office of Historic Preservation , and Los Angeles County Central Library	Prior to issuance of building permits

Mitigation Measure	Responsible Agency or Party	Action Required	Monitoring Agency or Party	Timing
from the survey data. Copies of the documents shall be filed with the appropriate State (State of California, Office of Historic Preservation) and local repositories (Los Angeles County Central Library).				
Mitigation Measure 3.2.4: All repair and cleaning work on architecturally or historically significant features shall be conducted according to the design development plans and specifications prepared by a qualified preservation architect to the satisfaction of the Department of Regional Planning. In addition, the repair and cleaning work shall be conducted by a contractor experienced and qualified in the repair or cleaning of such features as ornamental plaster and iron work.	Project Applicant	Have design development plans and specifications prepared by a qualified preservation architect. Hire an experienced and qualified contractor to repair or clean any of the historically significant features.	Los Angles Department of Public Works and Los Angeles County Department of Regional Planning	Prior to issuance of building permit and during construction
Mitigation Measure 3.2.5: A Secretary's Standards conformance report shall be prepared by a qualified professional architectural historian identified in Mitigation Measure 3.2.1 to evaluate the design development plans of the modified project design for conformance with the Secretary of the Interior's Standards for Treatment of Historical Properties noted in Mitigation Measure 3.2.1 The design development plans shall include, but are not limited to, the following:	Project Applicant	Minimize the number of attachments necessary to connect banner signage to the building; Expose as much volume of space in the auditorium area between the balcony and edge of the stage as reasonably possible; treat the walls to emphasize the stage space; expose the coffered underside of the balcony as reasonably possible; retain	Los Angeles County Department of Regional Planning and Los Angeles County Historical Landmarks Commission	Prior to issuance of building permit

	Mitigation Measure	Responsible Agency or Party	Action Required	Monitoring Agency or Party	Timing
•	A study of options to minimize the		the fire escape stairs if		
	number of attachments necessary to		possible; paint the building		
	connect banner signage to the building		the color recommended by		
	exterior if any banner signage is		the qualified architectural		
	proposed.		historian; conduct required		
•	A study on the feasibility of heating and		studies		
	cooling the high volume auditorium				
	space. A range of options for treatment				
	of the high volume auditorium space				
	between the balcony edge and stage				
	shall be evaluated based on specific				
	needs of the tenant, with the goal of				
	exposing the volume of the space and				
	decorative ceiling and walls to the				
	maximum extent feasible. In addition,				
	cleaning of the attic space between the				
	historic ceiling and the roof of the				
	auditorium shall be studied and the				
	treatment of this issue may factor into				
	the ability to expose all or certain				
	portions of the historic ceiling.				
•	A study of a range of options for				
	treatment of the new wall to emphasize				
	the stage space. It may be painted in				
	tromp l'oeil fashion to mimic a partially				
	drawn-up stage curtain or will be				
	otherwise finished in a fashion				
	emphasizing the stage area.				
•	A range of options for treatment of the				
	coffered underside of the balcony shall				
	be evaluated based on specific needs of				

Timing	During construction and project operation	Prior to issuance of building permit
Monitoring Agency or Party	Los Angeles County Department of Regional Planning	Los Angeles County Department of Regional Planning
Action Required	Clean and maintain the exterior of the building using the gentlest means possible	Provide hand measured drawings of the lobby stair.
Responsible Agency or Party	Project Applicant	Project Applicant
the tenant. A suspended grid system incorporating light fixtures without acoustical ceiling tiles (exposing the underside of the balcony) shall be considered.  • Further consideration on the retention rather than removal of the existing fire escape stair on the east elevation.  • Selection of paint color choices for the building exterior based on tenant needs and recommendations provided by the qualified architectural historian identified in Mitigation Measure 3.2.1.	Mitigation Measure 3.2.6: The decorative features, including ornament and openings on the north elevation shall be retained and shall be cleaned and maintained with gentlest means possible at less than 400 psi, to be determined after inspection and recommendation by a qualified masonry restoration specialist.	Mitigation Measure 3.2.7: Detailed, hand measured drawings and selective templates prepared by a qualified preservation architect shall be made of the lobby stair for possible future reconstruction.

Mitigation Measure	Responsible Agency or Party	Action Required	Monitoring Agency or Party	Timing
Mitigation Measure 3.2.8: Alterations to the Golden Gate Theater building (interior or exterior) shall be prohibited until a tenant has signed a lease.	Project Applicant	Submit a signed lease by the tenant prior to any alterations to the building being conducted.	Los Angeles County Department of Regional Planning	Prior to issuance of building permit



## APPENDIX D

Cultural Resources Conditions of Approval for Final Environmental Impact Report for Reuse of Golden Gate Theater (approved by County of Los Angeles Board of Supervisors)

# CONDITIONS OF APPROVAL CONDITIONAL USE PERMIT NO. 2008-00136-(1)

- 43. The permittee shall abide by the following conditions related to the renovation of the fomer Golden Gate Theater:
  - a. The term "stabilized" shall mean "the act or process of applying measures designed to re-establish a weather resistant enclosure and the structural stability of an unsafe or deteriorated property while maintaining the essential form as it exists at present" (Stabilization Treatment Standard, The Secretary of the Interior's Standards for the Treatment of Historic Properties, 1983).
  - b. The term "conserved" shall mean "preservation from loss, depletion, waste, or harm" (Martin E. Weaver. *Conserving Buildings: A Guide to Techniques and Materials*. New York: John Wiley & Sons, Inc., 1993).
  - c. References to "Gridlines" shall refer to the gridlines depicted on the floor plan marked Exhibit "C."
  - d. At least 75 percent of the available ceiling space consisting of the original lobby ceiling located between Gridlines G-J and Gridlines 1-6, the original underside of the balcony ceiling located between Gridlines C-F and Gridlines 1-6, and the original auditorium ceiling located between Gridlines B-D and Gridlines 1-6, shall remain exposed. This condition requires each of the identified, available ceiling spaces to remain 75 percent exposed. For purposes of this condition, "available ceiling space" shall mean the historic, decorative coffered portion of the ceiling with allowance for existing and new penetrations to account for building systems. Treatment of the underside of the lobby ceiling, the underside of the balcony ceiling, and the original auditorium ceiling shall include painting, and exposed original gold ornamentation shall be stabilized and conserved.
  - e. Four extant lighting fixtures mounted at the underside of the balcony ceiling shall be retained and used to provide lighting, if feasible, or if not feasible shall be retained for decorative purposes; however, the lighting fixtures may be moved within the underside of the balcony to provide visual balance. New florescent fixtures shall be designed so as not to detract from the historic elements.
  - f. The original walls in the lobby and underside of the balcony area located between Gridlines C-J and Gridlines 1-6, shall be encapsulated behind new partition walls containing some of the tenant's retail display units, shelving, and lighting.
  - g. New partition walls encapsulating the original auditorium walls between Gridlines B-C and Gridlines 1-6 shall not exceed 10 feet in height. New partition walls shall contain some of the tenant's retail display units, shelving, and lighting. Tenant graphic displays shall be permitted up to 15 feet in height. The original auditorium walls shall be exposed above the new partition walls and tenant graphic displays. The portion of the proscenium arch above 10 feet in height and the leading edge of the balcony shall be exposed. The ornament surrounding the two false balconies flanking the proscenium arch located midway between Gridlines B-C and between Gridlines 1-2 and between

Gridlines 5-6 shall be at least 75 percent exposed. Treatment of the exposed walls shall include painting, and exposed original gold ornamentation shall be stabilized and conserved.

- h. The four existing lighting fixtures mounted at the underside of the balcony ceiling shall be retained in place or crated and stored on site. A minimum of one lighting fixture shall be included in the renovated interior and remain visible to the public. This fixture need not be kept in its original location.
- i. The lobby concession shell shall be crated and stored on site.
- j. The original auditorium floor shall be leveled in a reversible manner.
- k. The mezzanine shall be encapsulated.
- I. Original materials to be stored on site shall be inventoried and stored in the mezzanine or balcony. The inventory of all stored materials shall remain in the mezzanine storage area, and a copy shall remain on file at Regional Planning. The inventory shall include instructions stating that the original materials shall not be discarded. Storage crates shall be clearly marked "do not discard" or similar language to indicate that the stored items shall not be discarded.
- m. The balcony and mezzanine shall be mothballed according to guidance provided by the National Park Service in *Preservation Brief 31: Mothballing Historic Building*, which includes three major actions: documentation, stabilization, and mothballing. Access to the mezzanine and balcony shall be provided by an exterior staircase.
- n. The tenant shall incorporate a minimum of six historic photographs and panels into the interior design that are at least 16-inch x 20-inch.



# **APPENDIX E**

Los Angeles Conservancy support letter for modified project design (March 17, 2010)



March 17, 2010

#### Hand Delivered

Los Angeles County Regional Planning Commission Attn: Anita Gutierrez County of Los Angeles Department of Regional Planning 320 W. Temple Street Los Angeles, California 90012

Re: Golden Gate Theater Adaptive Reuse Project

Dear Members of the Commission:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to further comment on the Golden Gate Theater Adaptive Reuse Project. At the commission's February 17, 2010 hearing on the project, the Conservancy emphasized the need for explicit and enforceable conditions to ensure that the theatre's historic features are protected. We followed our testimony with two letters, including a detailed list of proposed conditions. We are pleased that the staff report incorporates the vast majority of our proposed conditions, providing assurance that the project will be completed in a sensitive and reversible manner.

From the outset, the Conservancy has sought to ensure that alterations closely adhere to the Secretary of the Interior's Standards, be reversible, and maintain the theatre's listing in the National Register of Historic Places. The original proposal would have left the interior virtually unrecognizable by removing or covering up architectural features, including demolition of the balcony. Over the past year, at the request of the Regional Planning Commission, the Conservancy has provided examples of historic theatres that have been sensitively converted for retail use and worked with the Charles Company and Chattel Architecture to explore modifications to the original plan, including a meeting last Friday with a representative of CVS.

In response to concerns raised by the Conservancy, the State Office of Historic Preservation, the Los Angeles Historic Theatre Foundation, and community residents, the project has been substantially modified to leave the vast majority of the theatre interior intact and visible. Most significantly, the modified plan will retain the entire balcony and leave at least 75 percent of the original ceiling exposed. The proscenium arch and the two curved walls flanking it will also remain visible, as will the edge of the balcony. In addition, the raked floor will be leveled in a reversible manner; the volume of the original auditorium space will be maintained; existing light fixtures will be retained and reused;

and all gold ornamentation will be conserved, including the column capitals, moldings, and the frieze around the auditorium.

Although the Conservancy would like to see the lobby concession shell incorporated into the retail plan, we believe that the modified plan and project conditions will maintain the theatre's listing in the National Register and enable the theatre to be returned to performance-related use in the future.

Although the proposed use as retail space is not ideal, the Conservancy feels that it is strongly preferable to leaving the theatre vacant and deteriorating for the foreseeable future. We sincerely appreciate the willingness of the Charles Company and CVS to reconfigure their plan to protect the theatre's most significant features, and we applaud the County Regional Planning Commission for making the building's preservation a priority. We look forward to seeing the long-vacant Golden Gate Theatre once again occupied and accessible to neighborhood residents.

Sincerely,

Director of Advocacy